

Remarks/Arguments

In the Office Action, claims 31, 34, 35, 38, 40, 41, 43, 47, and 59 have been amended. New claims 61-66 have been added. Applicants respectfully submit that support for the new claims can be found in the specification, as originally filed, at least on page 16, lines 16-19, and page 24, lines 1-4. No new matter has been added as a result of the newly added claims or due to the amendments. Thus, claims 31-38, 40-50, and 57-66 are pending.

Claim Rejections Under 35 U.S.C. §103(a)

Examiner has rejected claims 31-38, 40-50 and 57-60 under 35 U.S.C. §103(a) as being unpatentable over Montague, et al. (USPN 5,761,669, "Montague") and further in view of Kuhn (USPN 6,023,765).

Applicants respectfully submit that the combination of Montague and Kuhn is improper and does not teach or suggest the limitation of mapping access control limits in another one of said plurality of security styles into said first security style using static and dynamic mapping, as claimed in independent claims 31 and 43.

Applicants respectfully submit that the Examiner has not demonstrated the motivation required to combine Montague and Kuhn. The Examiner has stated:

[i]t would have been obvious to one of ordinary skill in the art to allow for static mapping of access permissions as taught by Kuhn. One would be motivated to do so because static mapping allows one to reduce system overhead (col. 10, lines 40-45).

(Office Action dated 12/09/05, p. 3). In the areas cited by the Examiner, Kuhn discloses:

By establishing a static mapping the trusted interface does not need to translate each user request into a <level, compartment-set> pair for each request. System overhead is thus reduced because the RBAC software is needed only when a user logs into the system to establish a session.

(Kuhn, col. 10, lines 39-44) (emphasis added).

Thus, Kuhn discloses the reasons why static mapping is desirable. This is entirely different from using static mapping along with dynamic mapping. In fact, by this reasoning, dynamic mapping should not be used because it does not reduce system overhead. Thus, this alleged motivation can be interpreted as teaching against use of dynamic mapping, which of course teaches against use of dynamic mapping along with static mapping. Further, since Montague discloses dynamic mapping, the modification of Montague as suggested by the examiner to provide static mapping would render Montague unsatisfactory for its intended purpose, which is to control access to objects on different operating systems. (See MPEP 2143.01 (V)).

The Examiner appears to have merely taken a desired end result, as recited in Applicants' claims, and stated that a combination of Montague and Kuhn achieves this end result. Such a position is impermissible hindsight gained solely from Applicants' disclosure. Applicants respectfully request the Examiner point to the required intrinsic or extrinsic motivation within the references themselves, or within knowledge of persons of ordinary skill in the art at the time of the invention, to form such a combination, or withdraw the rejection.

In view of the foregoing, Applicants respectfully submit that claim 31, which recites that static mapping is performed for validation of said access control limits for said file and dynamic mapping is performed for reading or modification of said access control limits for said file, is allowable over Montague and Kuhn. Applicants therefore respectfully request of the rejection of claim 31 and associated dependent claims, including newly added claims 61-63.

Also, Applicants respectfully submit that claim 43, which recites that static mapping is performed for validation of said access control limits for said file and dynamic mapping is

performed for reading or modification of said access control limits for said file, is allowable over Montague and Kuhn. Applicants therefore respectfully request of the rejection of claim 43 and associated dependent claims, including newly added claims 64-66.

Conclusion

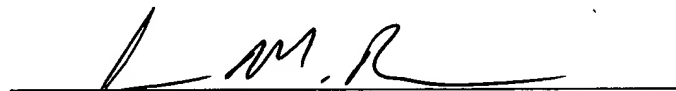
Applicants respectfully submit that in view of the amendments and discussion set forth herein, the applicable rejections have been overcome. Accordingly, the present and amended claims should be found to be in condition for allowance.

Applicants request a teleconference to expedite the prosecution of this application.

If there are any additional charges/credits, please charge/credit our deposit account no. 02-2666.

Respectfully submitted,
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